IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
Plaintiffs,	§ 8	
V.	8 8	
•	§	Civil Action No. 4:20-cv-00957-SDJ
GOOGLE LLC,	§	
	§	
Defendant.	§	

NOTICE BY DEFENDANT GOOGLE LLC REGARDING MULTIDISTRICT LITIGATION

Defendant Google LLC respectfully updates the Court on an upcoming filing that concerns venue issues similar to those presented in its pending Motion to Transfer. Dkt. 28. As reflected in the parties' Joint Report, thirteen new digital-advertising lawsuits were filed against Google on April 19-20, 2021 that relate to this action. *See* Dkt. 108 at 6-7. These suits were filed in courts across the country, including in Wisconsin, Ohio, New Jersey, New York, West Virginia, Delaware, and Mississippi. These new cases bring the total related cases to at least 28 in some 16 different jurisdictions. In the interest of efficiency and uniformity, Google will petition the Judicial Panel on Multidistrict Litigation ("JPML") to centralize all related cases before a single district judge. The petition will list this action, *Texas v. Google*, as among the related cases. In doing so, Google does not intend to waive or withdraw its pending Motion to Transfer, which remains important to resolve the venue issues raised with respect to this case. That motion, however, cannot address the venue of the 28 other related cases now pending in other districts. Google therefore must move forward with its motion to the JPML.

Dated: April 30, 2021

Respectfully submitted,

R. Paul Yetter
State Bar No. 22154200
Bryce L. Callahan
State Bar No. 24055248
YETTER COLEMAN LLP
811 Main Street, Suite 4100
Houston, Texas 77002
(713) 632-8000
(713) 632-8002 (Fax)
pyetter@yettercoleman.com
bcallahan@yettercoleman.com

Eric Mahr (pro hac vice)
Julie S. Elmer (pro hac vice)
FRESHFIELDS BRUCKHAUS DERINGER LLP
700 13 Street NW, 10 Floor
Washington, D.C. 20005
(202) 777-4545
(202) 777-4587 (Fax)
eric.mahr@freshfields.com
julie.elmer@freshfields.com

John D. Harkrider (pro hac vice) AXINN VELTROP & HARKRIDER, LLP 114 West 47th Street New York, NY 10036 (212) 728-2210 jharkrider@axinn.com

Daniel S Bitton (pro hac vice) AXINN VELTROP & HARKRIDER, LLP 560 Mission St. San Francisco, CA 94105 (415) 490-1486 dbitton@axinn.com

ATTORNEYS FOR DEFENDANT GOOGLE LLC

CERTIFICATE OF SERVICE

I certify that on this 30th day of April 2021, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Bryce L. Callahan

Bryce L. Callahan